

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GALLIE DOSSOU,

INDEX No. 13cv2800 (GBD) (KFN)

X      **DECLARATION OF  
PLAINTIFF GALLIE DOSSOU**

Plaintiff,

-against-

REYER PARKING CORP. and GERALD LIEBLICH,

Defendants.

X

**GALLIE DOSSOU** hereby declares under the penalty of perjury as follows:

1. I am the Plaintiff in the above-captioned action and am therefore fully familiar with the facts and circumstances had herein.
2. I have read the Complaint in this action and hereby incorporate it by reference. I know the facts alleged in the Complaint to be true based upon my personal knowledge. As to facts alleged upon information and belief, I believe them to be true.
3. In or about January 2011, I began working for Defendant REYER PARKING CORP. as a valet and continuously worked for Defendant REYER PARKING CORP. until or about March 6, 2013. I was always told by my managers that I worked for Defendant REYER PARKING CORP. During my tenure at Defendant REYER PARKING CORP., I was instructed by my supervisors to answer the telephone, "Reyer Parking" or just simply "Reyer." This is exactly what I did, as well as all the other employees witnessed answering the phone. Upon information and belief, if one was to call "(917) 889-0582," which is the number provided on the Claim Checks, one would be able to reach a person who would claim to work for Defendant REYER PARKING CORP.

4. My job description was working as a valet, parking cars, and attending the parking garage owned and operated by Defendant REYER PARKING CORP. located at 1872 East Tremont Avenue, Bronx, New York 10460.

5. Annexed hereto as **EXHIBIT "A"** are pictures of the parking garage I worked at, located at 1872 East Tremont Avenue, Bronx, New York 10460, owned by Defendant REYER PARKING CORP. Due to the fact that I worked at the location for approximately two (2) years, I can attest that the pictures accurately depict 1872 East Tremont Avenue, Bronx, New York 10460. The sign, which reads, "REYER PARKING, CORP., LIC. 1352450" was there, in that same place, during the entirety of my employ and, upon information and belief, is still there today.

6. Annexed hereto as **EXHIBIT "B"** is a Claim Check from REYER PARKING CORP., obtained from 1872 East Tremont Avenue, Bronx, New York 10460, from the parking garage, which I worked at in connection with this matter. The Claim Check annexed hereto is identical to the claim checks I would hand to clients of REYER PARKING CORP. during the time I was employed with them. The Claim Check is clearly marked, "Reyer Parking Corp, LIC # 1352450" as was every claim check I handed to clients when they parked their vehicles.

7. My job duties were completely controlled by Defendant REYER PARKING CORP.

8. I was required to work eighty-four (84) hours per week, twelve hours a day, seven days a week.

9. REYER PARKING CORP. paid me at the rate of \$350.00 per week.

10. Annexed hereto as **EXHIBIT "C"** are Cash Sheets from Defendant REYER PARKING CORP., which were taken by me during my employ with Defendant REYER PARKING CORP. The cash sheets are clearly stamped, 'Reyer Parking Corp, LIC # 1352450.'

11. Annexed hereto as **EXHIBIT "D"** are cash receipts in connection with my employ at Defendant REYER PARKING CORP., which were taken by me during my employ with them. They are clearly stamped, "Reyer Parking Corp, LIC # 1352450"

12. During my employ with Defendant REYER PARKING CORP., I was allowed one vacation day per month.

13. I was not paid for all hours worked, nor was I paid overtime compensation.

14. I was not paid proper minimum wage.

15. When I complained to Defendant REYER PARKING CORP. regarding my rate of pay, I was promptly discharged from my employ as retaliation.

16. The only information I know about FDD ENTERPRISES is that when a client would pay with a check, the check was to be made out to FDD ENTERPRISES. I have no other knowledge about FDD ENTERPRISES. I was never told the reason for this, but I followed the instructions of my supervisors.

17. I have no knowledge of who non-party PEAK TIME PARKING CORP. is, other than I have heard the name before a few times before.

Dated: Brooklyn, New York  
June 7, 2013

  
Gallie Dossou